

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V.

ARTURO ROJAS-JAIME,

Defendant.

05 Cr. 708 (AKH)

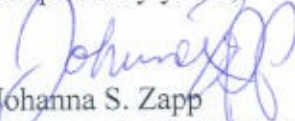
MOTION FOR RELEASE OF
MDC MEDICAL RECORDS
AND RELATED DOCUMENTS

Early Saturday morning, while housed at MDC Brooklyn, defendant suffered a serious brain injury. He was brought to the Lutheran Medical Center for treatment where he underwent a craniotomy.

I respectfully request copies of the MDC's medical records for defendant Arturo Rojas-Jaime, Reg. No. 59695-054. In addition to defendant's medical records, I also request that the MDC release any documents, notes, investigation reports, etc. pertaining to the medical incident that occurred on January 12, 2008.

I have spoken to AUSA Anjan Sahni and he has no objections to the request.

Respectfully yours,


Johanna S. Zapp
Attorney for Defendant
Arturo Rojas-Jaime

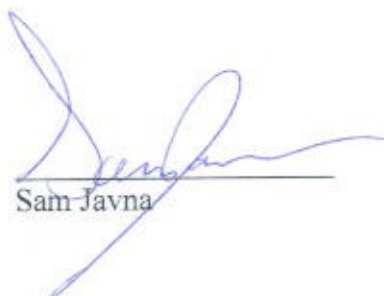
To: Clerk of the Court
U.S. District Court
Southern District of New York
U.S. Courthouse
500 Pearl Street
New York, New York 10007

AUSA Anjan Sahni
United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of January 2008, I caused to be served
a copy of this motion via fax on:

AUSA Anjan Sahni
United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007


Sam Javna